RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM FOR TSD FACILITIES ONLY

COMPANY NAME: Cello Film Corp. EPA I.D. Number: NJD0008134
COMPANY ADDRESS: 45-5 Corneila St. Nevark, NJ
COMPANY CONTACT OR OFFICIAL: OTHER ENVIRONMENTAL PERMITS HELD
BY FACILITY: // NPDES none
TITLE: Plant Superintendent / AIR
// OTHER
"INSPECTOR'S NAME: Alphonse Ignauza DATE OF INSPECTION: 5-27-01
BRANCH/ORGANIZATION: NJ DEP TIME OF DAY INSPECTION TOOK PLACE: 1300
(1) Is there reason to believe that the facility has hazardous waste on site?
a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:
Company admits that its waste is hazardous during the inspection.
Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
// The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
<pre>EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)</pre>
Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)
b. Is there reason to believe that there are hazardous wastes on-site which the company
claims are merely products or raw materials?
Please explain:

3 DON'T YES W KNOW - an internal communications or alarm system? intercon sxstem - a telephone or other device to summon emergency assistance from local authorities? inside building - portable fire equipment? but not in waste area. - adequate aisle space? - in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain. Adequate aisle space is not needed due to small quantity of drums handled. In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain. see above comment, all other procedures Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? wells on site no If you have, please comment, as appropriate. (9) a. Is there any reason to believe that groundwater contamination already exists from this facility? ontamination due to spillage defending on amout of spillage in past.

b. Do you believe that operation of this tability may affect groundwater quality? c. If "YES", explain. If froger precautions are not taken to contain spillage groundwater quality could be effected.
RECORDS INSPECTION Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? never recieved from Haz Waste off site source.

If "YES", does it appear that the tacility has

a copy of a manifest for each hazardous waste

*(8)

(13)	PER	SON	NEL TRAINING (§265.16)					-
	a.	Is	there written documentation of the following:					
		-	job title for each position at the facility related to hazardous waste management_and the name of the employee filling each job?	X				
		-	type and amount of training to be given to personnel in jobs related to hazardous waste management?	X		Saft,	ave y meet	ing
**		-	actual training or experience received by personnel?	X			arry	
(14)	fo fi ha	or e ires azar	the facility have a written contingency plan emergency procedures designed to deal with explosion or any unplanned release of dous waste?	λ		-		
u s	_a.		pes the plan describe arrangements made with cal authorities?		-	-		
	b.	to	as the contingency plan been submitted			_ , ,)		
			ow do you know?					
	-					- 5	N/A	
	C.		pes the plan list names, addresses, and none numbers of Emergency Coordinators?		-	_ \	10 con	×:.
	d.		pes the plan have a list of what emergency quipment is available?		-	\	Plan	1 4
	е.		s there a provision for evacuating facility ersonnel?	- —		_ /		
	f.		as an Emergency Coordinator present or on all at the time of the inspection?			_/		
(15			the owner/operator keep a written operating rd with: (§265.73)				1-	
	_		description of wastes received with methods W/Adates of treatment, storage or disposal?	7	no 4	astes 1	eciev.	ed
	-	· lc	cation and quantity of each waste?		2			
		tr	tailed records and results of waste analysis and reatability tests performed on wastes coming into cility?		X			

						wife States		100
				YES	<u>,</u>	KIXXW		
	- ,		- the generator's name, mailing address, telephone number, and EPA identification number			*		
			- the name, and EPA identification number of each transporter		-		*	
	*	*	 the name, address and EPA identification number of the designated facility and an alternate facility, if any; 	,=		*		*
		*	- a DOT description of the wastes					1//
			- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle		<u>k</u>			1//
***.	2 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	-	 a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regula- tions of the Department of Transportation and the EPA 			<u>.</u>		
			Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.		,	•		
1	(11)	plan	s the facility have a written waste analysis a specifying test methods, sampling methods sampling frequency? (§265.13)		X	. 7		
		a.	Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary All wastes are basically the same Company treats all waste as hazardous Don't Know					
		b.	Does hazardous waste come to this facility from off-site sources?	-	1	-	1=	
		c.	If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	**********				
	(12)	INS	PECTIONS (§265.15)					

a. Does the facility have a written inspection

**	- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	
	- a description of the steps necessary to decontaminate facility equipment during closure?	· \
	- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	
**	b. What is the anticipated date for final closure?	· · · · · · · · · · · · · · · · · · ·
1	c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?	
-	d. Does the written post-closure plan include:	
	- a description of planned groundwater monitoring activities and their frequencies during post-closure?	
. 19	- a description of planned maintenance activiti and frequencies to ensure integrity of final cover during post-closure?	es
1. 1.2.2	- the name, address and phone number of a person or office to contact during post-closure?	
*(17)	Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?	
*(18)	Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)	
*(19)	to the Regional Administrator for facilities con-	o ground water monitoring plan
	a. Does the plan indicate that at least one monito well has been installed hydraulically upgradien the limit of the waste mangement area?	ring t from /

b. Does the plan indicate that there are at least three

VISUAL OBSERVATIONS

		-			DON'T	-
(5)	SIT	SECURITY (§265.14)	YES	<u>001</u>	KNOW	
perate	a. 24 b.	Is there a 24-hour surveillance system? hr. during week and have guards Is there a suitable barrier which completely surrounds the active portion of the facility?	duri X	X ng	weekends	
	C.	Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the tacility?		X		
(6)		there ignitable, reactive or incompatible es on site? (§265.27)	X		detailer	
	a.	If "YES", what are the approximate quantities?	eig	ht (8) drams	5
	b.	If "YES", have precautions been taken to preve accidential ignition or reaction of ignitable or reactive waste?		X		
	c.	If "YES", explain				
ì	= d.	In your opinion, are proper precautions taken that these wastes do not:	so .			
_		- generate extreme heat or pressure, fire or explosion, or violent reaction?		X		
		- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	X		_	>
~24		- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	-	X	no file extinguish — Present	ers
		- damage the structural integrity of the device or facility containing the waste?	X			
		- threaten human health or the environment? Spilled material threaten environ	men	<u>X</u> +.		
n) -			*			

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you storage of waste would recommend to improve hazardous waste handling procedures at the facility? in more sound containers on fallets.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

	-	
STORAGE	TREATMENT -	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-	-9 Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impound- ment p. 8
Tank, above ground p. 8 Tank, below ground p. 8	Thermal Treatment pp. 12-1 Land Treatment pp. 9-10	Other
Other	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	DON'T YES NO KNOW
=	Other	
CON	VIAINERS (§265.170)	
1. Are there any leaking It "YES", explain. A functured drums leaked mat		X — — ting and 2 over tilled
of leaking? If "YES", explain,	ners which appear in danger s may leak if th	X hex are not repacked
3. Do wastes appear comp materials?	patible with container	<u> </u>
4. Are all containers c	losed except those in use?	<u>X</u>
	to be opened, handled r which may rupture the them to leak?	containers over filled
6. How often does the pl	lant manager claim to inspec	ct .

container storage areas?



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

01/27/97

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER -> NJD000813451

FACILITY NAME -> REICHHOLD CHEMICALS - TRUCKING

MAILING ADDRESS -> 45-5 CORNELIA ST NEWARK, NJ 07105

INSTALLATION ADDRESS -> 45-5 CORNELIA ST NEWARK, NJ 07105

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION II 290 BROADWAY NEW YORK, NEW YORK 10007-1866

ATTN: AIR & WASTE MANAGEMENT DIVISION, 22ND FL. **HAZARDOUS & SOLID WASTE PROGRAMS BRANCH RCRA NOTIFICATIONS**

TO: KURTZ, RONALD EHS MANAGER REICHHOLD CHEMICALS - TRUCKING 400 DOREMUS AVE NEWARK, NJ 07105

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

& EPA

PA Notification of Regulated Waste Activity United States Environmental Protection Agency

Date Received (For Official Use Only

, E.	3 United State	es Environmental Protection Agency	
/	I. Installation's EPA ID Number (Mark 'X' In the appr		STEP
Rechnoled	A. First Notification B. Subsequent No (complete item C) II. Name of Installation (Include company and specific	lification C. Installation's EPA ID Number	311
3	II. Name of Installation (Include company and specif		121
36	70 1111		
03	III. Location of Installation (Physical address not P.O		NG
K 1		. Box or Houte Number)	r
3 8	Street CORNELIA	STREET	1-1
()		[5] 7 R E E T	<u> 1 1 1 </u>
~ (T
mized	City or Town	State ZIP Code	لبل
. 20	APLIANI		
23	County Code County Name	MJ07/05-	
	County Code County Name	The late of the second	_
Eas Ke	ESSEX		
0	IV. Installation Mailing Address (See Instructions)		
En Sans	Street or P.O. Box		
35	SAME	EA S. S. L. E. A. A. S. HE ES ES ES ES ES ES	TT
Cellofilm	City or Town	State ZIP Code	<u> </u>
333		State ZIP Code	1 1
0	V. Installation Contact (Parson to be contact to		
	V. Installation Contact (Person to be contacted regard	ling waste activities at site)	
	Name (last)	(first)	
1	KURTZ	RONALD	
1'	Job Title	Phone Number (area code and number)	
	EHS MANAGER	201-465-2199	
1	VI. Installation Contact Address (See Instructions)		
	A. Contact Address B. Street or P.O. Box		
1	X 400 00REV	AUG AUGUIGE	
0	City or Town		
25		State ZIP Code	
	MEWARK	NJ07/05-	
	VII. Ownership (See instructions)		
	A. Name of Installation's Legal Owner	managed Dille Managed	
	REICHHOLD CHEM	IICALS INC.	
	Street, P.O. Box, or Route Number	T C, 0	
	2400 ELLIS ROX		
7	City or Town		
1		State ZIP Code	
1			
>	one Number (area code and number)	d Type C. Owner Type D. Change of Owner (Date Changed) Indicator Month Day	Year
	800-451-9562	P Yes No X Monthly Day	rear

	nstructions.)
A. Hazardous Waste Activity	B. Used Oil Fuel Activities
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220 - 2,200 lbs.) c. Less than 100 kg/mo (220 lbs.) 2. Transporter (Indicate Mode in boxes 1-5 below) b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions. 4. Hazardous Waste Fuel a. Generator Marketing to Burner b. Other Marketers c. Burner - indicate device(s) - Type of Combustion Device Mode of Transportation 1. Utility Boiler 2. Industrial Boiler 3. Highway 5. Underground Injection Control IX. Description of Regulated Wastes (Use additional sheets if necessary)	1. Off-Specification Used Oil Fuel a. Generator Marketing to Burner b. Other Markerer c. Burner - indicate device(s) - Type of Combustion Device 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace 2. Specification Used Oil Fuel Markete (or On-site Burner) Who First Claim the Oil Meets the Specification
A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the cl wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24) 1. Ignitable 2. Corrosive 3. Reactive 4. EP Toxic (D001) (D002) (D003) (D000). (List specific EPA hazardous waste nur	mber(s) for the EP Toxic contaminant(s))
B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more the	an 12 waste codes.)
F 0 0 3 F 0 0 5	5 6 11 12
C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.) 1 2 3 4	5 6
. Certification	
certify under penalty of law that I have personally examined and am familiar with the and all attached documents, and that based on my inquiry of those individual obtaining the information, I believe that the submitted information is true, accuminate the significant penalties for submitting false information, including the information of the information	als immediately responsible for
Rowald Change Rowald C. Kurtz - Manag	Date Signed 1/10/97
This facility is part of a larger facili	ty (EPA ID#NJ00487971
remaining activite active (Trucking)	ty will be
Salar San - Alarka - San	

IU - For Official Use Only



RCRIS NOTIFICATION DATA DISCREPANCY FORM

Date

Information from RCRIS	New Information (make change to "E" record only)
Facility Name: Cello film Composition Facility EPA ID Number: NJD 000 8 13 45	Facility Namo:
Facility Address: 45-5 Cornelia Street	Facility Address:
City: Newade St: NJ Zip:_Mailing Address:	City:StrZip:
City: St: Zip:_ Facility Contact: Phone: Owner/Operator:	City: St: Zip: Facility Contact: Phone:
Waste Codes:	SIC Code(s): Waste Codes:
Generator Status (LQG/SQG)Other:	Generator Status (LOG/SOG)
In response to this request, please mo General Generator Information:	odify RCRIS Handler Notification Data for the following: Add/Change Generator Status Codes:
Facility Name EPA ID Number	C # C # 1 conditionally exempt Small Quantity 6 No longer Generates HW:
Facility Address Mailing Address Phone	Generator 2 Definitionally Excluded Wastes 7 No longer Generates HW; Out of Business Out of Business
SIC Code(s) Waste Code(s)	3 Delisted Wastes 8 Never Generated Hazardous Waste
Other	9 ID Number to Transport Non-Hazardous Waste 1 Regulated Under Another ID Number(s) (list below)
IN7/03-17-94 JL	Joel Golumbek, Chief, NJCS Date



CELLOFILM CORPORATION

46 ALBERT AVENUE NEWARK, NEW JERSEY 07105

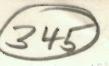
JAMES T. EFTAXES
TRANSPORTATION MANAGER

PHONE N. J. 438-7100 N. Y. 564-2063



RAYMOND WATYCHOWICZ PLANT SUPERINTENDENT 241 UNION AVENUE WOOD-RIDGE, NEW JERSEY





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA	TRANSPORTER	INSPECTION	CHECKLIST

JUN 17 9 48 AM 81

ENVIRONMENTAL PROTECTION

NEW YORK, N.Y. 10007

Tra	insporter Name: Cello Film Corp. EPA I.D.:	NJDOC	0081	3 451	
Tra	nsporter Address: 45-5 Cornelia St. Driver: Newark, NJ.	N/A			
		Ye	es	No	<u> </u>
1.	Does the transporter have an EPA I.D. number?	()	()	. ()
2.	Is the transporter carrying hazardous waste?	()	()	X)
3.	Does the transporter have a manifest?	()	()	x)
4.	Does the manifest show the following information: N/Δ				
	a. Name, address, I.D. of generator	()	()
	b. Name, address, I.D. of transporter	(()
*; , 4, .,	c. Name, address, I.D. of designated facility	()	()
	d. Name of alternative facility))
	e. DOT waste description	()		\ <u></u>
	f. Quantity of waste-volume, weight, number of containers	()	(
N	g. Signed certification statement	()	().
5.	Does the manifest information confirm vehicle load? M/A	. ()	: ()
6.	Is the vehicle placarded for hazardous waste? N/A	()	()
7.	General comments: Cello Film does not transport hazardou	is wast	e	The	2_
	Eompany has applied to register 4 v		fo	,	
	transporting hazardous waste in NJ.	with.	the	DEF	2
	Use of vehicles will be to haul hera	ralous	Lcc	to	
	from associated facilities to disposal site facilities.	s and lo	r) be	weer	ı
	the state of the s	010	lanca	7	

Inspected by: alphonse Tannuz Date: 5-27-81

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: Cello Film Corp. EPA I.D. NUMBER: NJD 000813451
COMPANY ADDRESS: 45-5 Cornelia st. Newart, NJ.
y Mr. Watychawiz, 2) mr. Eftaxes INSPECTOR'S NAME: Alphonse I annuz
TITLE & Plant superintendent, 2) Transportation BRANCH/ORGANIZATION: NJ. DEP manager
CHECK IF FACILITY IS ALSO A TSD DATE OF INSPECTION: $\zeta - \frac{1}{2}$ DON'T
YES NO KNOW
(1) Is there reason to believe that the facility has hazardous waste on site?
a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:
Company admits that its waste is hazardous during the inspection.
Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
EPA testing has shown characteristics of ignitability, corresivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) Waste material is Cellomers finished goods that are cleaned out of cello films tank was oons and drumed. All materials are alkyd resins mixed together consisting of flammable and non-flammable mode cal
flammable and non-flammable material.

planket wash leaking an	well at the state of the state
of flama	hable and combustible material.
	d. Describe the activities that result in the generation of hazardous waste. Cleaning and draining of tank wagoons.
A ST THE ME HAT THE STREET, STORE	and the second s
(2)	Is hazardous waste stored on site?
	a. What is the longest period that it has been accumulated? more than 1 year.
ŀ	each drum? $\frac{X}{X}$
	Has hazardous waste been shipped from this facility since November 19, 1980?
	a. If "yes," approximately how many shipments were made?
-	
	Approximately how many hazardous waste shipments off site have been made since November 19, 1980?
	a. Does it appear from the available information that there is
li l	o. If "no" or "don't know," please elaborate.

2

		Does each manifest (or a representative sample) have the following information?
		- a manifest document number no manifests because was to
		- a manifest document number no manifests because was how the generator's name, mailing address, transported of site telephone number, and EPA identification number
		- the name, and EPA identification number of each transporter
	*	- the name, address and EPA identification number of the designated facility and an alternate facility, if any:
.~		- a description of the wastes (DOT)
and a second	ilidaya ya estan	of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle
		- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA
(5)		e there any hazardous wastes stored on site at the time $\underline{\hspace{0.2cm} X}$
	a.	If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?
	b.	If not properly packaged or in secure tanks, please explain. zontainers rusted and leaking.
*	c.	Are containers clearly marked and labelled? $_$ X
	d.	Do any containers appear to be leaking? $\underline{\hspace{1cm} \hspace{1cm} \hspace{1cm} }$
	e.	If "yes," approximately how many?
		I container was punctured and leaking and
	2	Containers were over filled with resins.

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year?

a. How do you know?

- (7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?
 - a. If "no," have Exception Reports been submitted to EPA covering these shipments?

[8] General comments.

Zello Film Corp. is a trucking outfit for Poly Chrome Yonkers NY which is a parent company of Cello Film Woodridge, No and Cello mer Albert ave.

Newark, No. Zello Film transports finished products for Poly Chrome, nitrozellulose for Cello film -woodridge-, and alkyd resins for Cellomer. Zello film does not haul hazardous waste.

Tank wayoons containing resins are rinced out and material is drummed and stored in trailer lot. Tank wagoons are also washed out with zaustic solution (7,5% NaOH), rinced with water which is neutralized and discharged to the sever (Passaic Vally Sewage Authority), caustic solution is also new tralized and discharged to sever when it is spent. The 3 tanks used in the tank wash system were all in good condition, this wash system was implemented approximatly 1 year ago,

^{*} The effective date for this requirement is March 1, 1982.

Observations and/or Other Comments

A drum(55gal) of waste oil from 'Cello Film vehicles (crank case
oil) was noted on site. Cello Film gives this material to
a garbage track to use as hydrolic fluid on the truck. mr.
Etta Xes stated that the company was Shubert of Newart
but was not sure of the exact company name: Cella Film
was informed that their waste oil must be removed by a
registered special waste hauler to a registered facility.
Inspection of lot revealed that some spilled resins
(affrox: 10'x5') and waste oil sludges on soil and gravel
were noted. A rusted bottom section of a drum containing
hardened resintype material was also noted. Eight (8)
drums of flammable and non-flammable altyd resins were
noted. One drum was leaking because it was punctured
and 2 other drums were over filled and leaked resins
- onto the soil,
Sixteen drums on a flat bed truck were noted in
the lot. Some dryms were leaking and were in
poor condition (i.e. rusted). Mr. EFtaxes stated that this
material was wat that will be brought to the Cello Film
. cosp. in woodridge, NJ. for use. Spilled material did
affear to be wax.
A box trailer on site contained approximatly
- 25 one gallon cans of flammable blanket wash product.
Some cans were rusted through. mr. Effaxes stated
that this trailer was only on site for 2 months and these
zontainers came from a division of Polychrome. The
Inspector's Signature Facility Operator's Signature
alphonse Lown on it

Observations and/or Other Comments
exact facility was not known by mr. EFtaxes. This
The real of packed into drums actived
Cello film will achieve the following in order to
compy with existing state and tederal regulations
i). refack all leaking drums and those in poor condition within I week of inspection,
within I week of inspection,
1 -week of inspection
1 -week of inspection,
3). Label and date all waste materials in containers, and.
4) Send a letter to NO DEP indicating disposator reuse
of 1 gallon cans within 1 week of inspection,
Mr. watychaviz was informed that cello Film
Eannot store waste from Newark facility at woodridge
facility unless woodridge is registered as a transfer
Station with the NJ. DEP. mr. watychauiz indicated
that this will not be done and Sty waste Inc. so.
Kearny, NJ will be contacted to remove waste drums
presently on site that have been stored for more than
6 months.
· · · · · · · · · · · · · · · · · · ·
· · · · · · · · · · · · · · · · · · ·
Inspector's Signature Facility Operator's Signature

NTINUED FROM THE FRONT			Consent Control of	Want to
I. SIC CODES (4-digit, in order of priority)			attended to	le
A. FIRST		(specify)	B. SECOND	
2,8,6,9 Industrial Organic	Chemicals	7 15 16 - 19		
C. THIRD		c (specify)	D. FOURTH	
2.8.5.1 Paints and Varnishe	es	7		
II. OPERATOR INFORMATION		15 16 - 19		Sales and
Cellofilm Corpo	A. NAME oration	, , , , , , , , , , , , , , , , , , , 		B. Is the name listed in Item VIII-A also the owner?
16	<u> </u>			YES NO
C. STATUS OF OPERATOR (Enter the app.	ropriate letter into the answ	er box; if "Other", specify.)	D. PHONE (d	rea code & no.)
F = FEDERAL M = PUBLIC (other than S = STATE O = OTHER (specify) P = PRIVATE	federal or state) P (s	pecify)	A 2015	8 9 3 8 7 1
E. STREET OF				
45-5 Cornelia S	treet			
F. CITY OR TOW	N	G.STATE H. ZIP CO	DE IX. INDIAN LAND	THE REAL PROPERTY.
Newark		N J 0 7 1 0	Is the facility located	
166		40 41 42 47 -	YES 52	M NO
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II. PROCESSES /	(continued)	
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. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- 4. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- 3. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.
- UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation, in addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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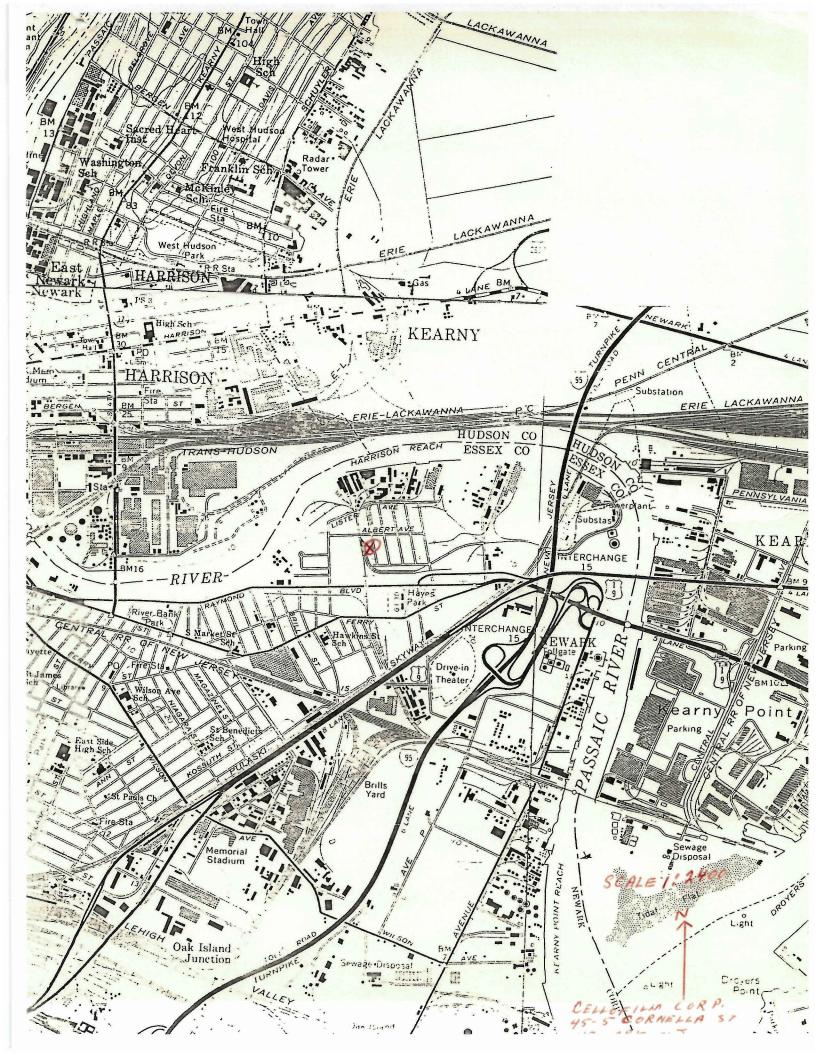
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President

EPA Form 3510-3 (6-80)

PAGE 5 OF 5

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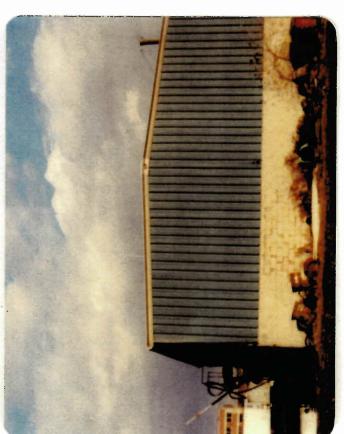


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CELLOFILM



CORPORATIO

241 UNION AVENUE • WOOD-RIDGE, NEW JERSEY 07075 • (201) 438-7100 • N.Y. (212) 564-20

ind

March 2, 1981

Mr. Bruce Adler, Attorney General Enforcement Branch Enforcement Division U.S. Environmental Protection Agency, Region II 26 Federal Plaza, Room 437 New York, N.Y. 10278

Dear Sir:

In answer to your letter of February 22, 1981, I am enclosing the following information:

Question I - Hazardous wastes:

Acetone
N. Butyl Alcohol
Di N Octyl phthalate
Ethyl Acetate
Methanol
Methyl Ethyl Ketone
Toluol
Methyl Iso Butyl Ketone
Xylene
Di Butly phthalate

Mixtures of all or some of the above are generated at the rate of approximately 100 gallons per week.

Question II -

No wastes have been removed in this period.

Question III -

E.P.A. identification number as a hazardous waste storage facility:

илдооо813451

Very truly yours, CELLOFILM CORPORATION

Robert Rossomando Vice President

MD 000 813 451 CE 93 9,10.93

COMPLIANCE EVALUATION INSPECTION (CEI) CELLOFILM CORPORATION (LOCATION NOW OCCUPIED BY REICHHOLD CHEMICALS, INC.) NEWARK, NEW JERSEY WORK ASSIGNMENT R02035

DR.

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2.0 SITE BACKGROUND	. 1
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3.1 Identification of Hazardous Waste	. 3
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ATTACHMENTS	
New Jersey Generator Inspection Report New Jersey Hazardous Waste Inspection Report	



1.0 INTRODUCTION

In accordance with RCRA policy, hazardous waste transporter, generator, or treatment/storage/disposal (TSD) facilities are subject to Compliance Evaluation Inspections (CEI) which address facility environmental concerns. The inspections are conducted to evaluate compliance with all applicable standards promulgated under 40 CFR Parts 262 through 268.

Under TES V Work Assignment R02035, CDM Federal Programs Corporation (CDM Federal) was contracted to conduct a CEI at the Cellofilm Corporation facility in Newark, New Jersey. Aaron Frantz of CDM Federal visited Cellofilm Corporation on September 10, 1993 to conduct the CEI. The information within this report was obtained from facility personnel and onsite records during the CEI, except where referenced otherwise.

The CEI was conducted using (as appropriate) the New Jersey Generator Inspection Report and the New Jersey Hazardous Waste Inspection Report. These documents were used as a basis for the inspection. All pertinent information is recorded in the inspection narrative. When necessary, relevant checklists were completed to provide additional detail when specific concerns were encountered during the inspection.

2.0 SITE BACKGROUND

2.1 FACILITY DESCRIPTION AND OPERATIONS

Cellofilm is not located at the address provided by EPA. Presently, the location is occupied by Reichhold Chemicals Inc.

The Reichhold facility consists of three buildings and is located on approximately two acres at the intersection of Albert Avenue and Cornelia Street in Newark, New Jersey. The production operations are situated on the northwest corner of the intersection and the product transportation operation is situated on the southwest corner of the intersection.

Cellofilm previously operated at the southwest corner of the intersection from 1968 to 1984. Cellofilm performed specialty operations regarding the manufacturing of nitrocellulose. In 1984, the facility was acquired by Polychrome, Inc. (Polychrome). A description of Polychrome's was not obtained.

In March 1989, Reichhold acquired the Cellomer Corporation (Cellomer), which was located at the northwest corner of the aforementioned intersection. Cellomer manufactured alkyd resins, which is the process currently performed by Reichhold. During the March 1989 acquisition, Reichhold also acquired the adjacent Polychrome facility.



Currently, alkyd resins are produced by Reichhold on the northwest corner of the intersection. Reichhold's product transportation operation is performed out of the former Cellofilm location, which is at the intersection's southwest corner.

In summary, the alkyd resins are produced in batches by mixing glycerol and phthalic anhydride. Solvents are also added to the resin to control the viscosity of the product. Six reactors are onsite to perform the batch operations. The batches are filtered with presses to remove solids from the product.

The inspection consisted of meeting the facility representative to obtain a description of the site operations, conducting a facility tour and reviewing facility documents. Facility representative Mike (Yogesh) Baxi was present during the inspection. As previously presented, the EPA ID# of Reichhold is NJD048797195.

2.2 HAZARDOUS WASTE GENERATION

Reichhold generates hazardous wastes form several different points in the facility operations. First, the reactors process lines are cleaned periodically with solvent. The solvent is captured, classified as D001/F003/F005, and shipped to a disposal facility. Sometimes the process line cleaning is performed using methyl ethyl ketone (MEK) and the D035 waste code is included in the waste classification. Second, if an off-specification batch can not be reworked into production, the batch is disposed of as a hazardous waste. Last, a parts/tool cleaning station, which generates a waste solvent, is located in the facility garage.

The waste solvents and resins from the cleaning operations and the off-specification resins are handled by Cycle Chem of Elizabeth, New Jersey. The facility previously used Oldover Corporation (Oldover) of Arvonia, Virginia for the disposal of these types of waste. However, Oldover only accepted bulk quantities of waste, and Reichhold only generates drum quantities of waste due to institution of a reblending program.

The parts/tool cleaning solvents are handled by Safety Kleen of Newark, New Jersey.

Reichhold also generates a nonhazardous solid waste from their process. The nonhazardous waste is the filter cake from the presses used to finish the product. The filter cake is handled by GSX Laidlaw Corporation located in Pinewood, South Carolina.

3.0 ON-SITE OBSERVATIONS

3.1 <u>IDENTIFICATION OF HAZARDOUS WASTES</u>

On September 24, 1993 the hazardous wastes that were being stored at the Reichhold facility were inspected. The facility maintains a hazardous waste storage area and two satellite accumulation areas. The following wastes were identified in the storage area:

- six 55 gallon drums of solid resin,
- eleven 55 gallon drums of waste resin,
- three 55 gallon drums of waste solvent, and
- four 55 gallon drums of waste resin solution.

Approximately 20 gallons of waste resin solution in a steel 55 gallon drum were identified in the satellite accumulation area by the control lab. Approximately 20 gallons of waste solvent in a steel 55 gallon drum were observed in the satellite accumulation area in the pilot room.

3.2 EXAMINATION OF PAPERWORK

All manifesting and notification requirements were complete. The facility maintains a contingency plan and training records were made available for review.

4.0 CONCLUSIONS

No areas of concern or potential violations were observed during this inspection. Also, no areas that may pose a threat to human health or the environment were identified.

Tom Jeccone

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION II

In the Matter of

COMPLAINT, COMPLIANCE ORDER,

AND NOTICE OF OPPORTUNITY

FOR HEARING

CELLOFILM CORPORATION
NJD000813451

Respondent.

Docket No. II RCRA-81-0114

Proceeding Under Section 3008 of the Solid Waste Disposal Act, as amended.

COMPLAINT

This administrative proceeding is instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. ("the Act"). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act, 90 Stat. 2795, P.L. 94-580 (1976).]

The Director of the Enforcement Division of the U.S. Environmental Protection Agency ("EPA"), Region II, Complainant in this proceeding, has determined that Respondent, Cellofilm Corporation has violated Section 3004 of the Act, 42 U.S.C. §6924 and the regulations promulgated thereunder, as hereinafter specified:

- Respondent owns and operates a facility located at 45-5 Cornelia Street, Newark, New Jersey 07105 ("the facility").
- 2. By notification dated August 18, 1980, Respondent informed EPA that it conducts activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6904(5) and in 40 CFR §261.3. By application dated November 17, 1980, Respondent requested a permit to conduct its hazardous waste activities.

- 3. On or about May 27, 1981, an inspection of the facility was conducted by duly-designated employees of EPA pursuant to Section 3007 of the Act, 42 U.S.C. \$6927. Said inspection was conducted for the purpose of enforcing the EPA regulations for hazardous waste management, 40 CFR Parts 260 through 265 (published in 45 Fed. Reg. 33063 et seq., May 19, 1980 and as amended), promulgated pursuant to Subtitle C of the Act, 42 U.S.C. \$6921 et seq.
- 4. The above-referenced inspection revealed that Respondent's facility was being used for the generation and storage of hazardous waste. The wastes on-site included alkyd resins, flammable blanket wash product and waste oil sludges.
- 5. 40 CFR Part 265 sets standards for all hazardous waste treatment, storage and disposal facilities.
- 6. 40 CFR \$265.171 provides that if a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator of the hazardous waste facility must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of 40 CFR Part 265. At the time of the May 27 inspection, a number of containers were rusted and some were leaking hazardous wastes onto the ground. These leaking wastes included alkyd resins and flammable blanket wash material. Respondent failed to transfer the wastes in these drums to other drums which were in good condition, and failed to manage these drums in any other appropriate manner. Respondent is therefore in violation of 40 CFR \$265.171.
- 7. 40 CFR §265.173(b) requires that containers holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak. At the time of the May 27 inspection, at least two containers were observed to be overfilled with waste resins which were leaking onto the soil. Respondent is therefore in violation of 40 CFR §265.173(b).

PROPOSED CIVIL PENALTY

In view of the above-cited violations, and pursuant to the authority of Section 3008 of the Act, Complainant herewith proposes the assessment of a civil penalty in the amount of fourteen thousand dollars (\$14,000.00) against Cellofilm Corporation for the violations specified hereinabove as follows:

For the violation of 40 CFR \$265.171 - \$ 7,000

For the violation of 40 CFR \$265.173(b) - \$ 7,000

TOTAL PENALTY - \$14,000

COMPLIANCE ORDER

Based upon the foregoing, and pursuant to the authority of Section 3008 of the Act, Complainant herewith issues the following Compliance Order against Respondent herein:

- 1. Respondent shall, by no later than sixty (60) days after the date of this Compliance Order, transfer all hazardous wastes presently stored in containers which are in poor condition to containers which are in good condition; or otherwise dispose of such wastes in accordance with the Act and the regulations promulgated thereunder.
- Respondent shall, by no later than sixty (60) days after the date of this Compliance Order, insure that containers which house hazardous waste are not filled to a level which would cause them to leak or overflow onto the soil.
- 3. Respondent shall, within sixty (60) days of the effective date of this Order, identify and remove any soil which has been contaminated by the release of hazardous waste at the facility.

NOTICE OF LIABILITY FOR ADDITIONAL CIVIL PENALTIES

Pursuant to the terms of Section 3008(a)(3) of the Act, a violator failing to take corrective action within the time specified in a Final Compliance Order is liable for a civil penalty of up to \$25,000 for each day of continued noncompliance. Such continued noncompliance may also result in suspension or revocation of any permits issued to the violator pursuant to the authority of the Act.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

As provided in Section 3008(b) of the Act, and in accordance with EPA's Consolidated Rules of Practices Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, 45 Fed. Reg. 24360 (April 9, 1980) (a copy of which accompanies this Complaint, Compliance Order, and Notice of Opportunity for Hearing), you have the right to request a hearing to contest any material fact set out in the Complaint, or to contest the appropriateness of the proposed penalty, or the terms of the Compliance Order. (Consistent with the provisions of Section 3008(b) of the Act, the hearing provided will be noticed and open to the general public, should you specifically request such a public hearing. In the absence of such a specific request, however, public notice of a scheduled hearing will not be published.)

To avoid being found in default, and having the proposed civil penalty assessed and the Compliance Order confirmed without further proceedings, you must file a written answer to the Complaint, which may include a request for

a hearing. Your answer (if any) must be addressed to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York, 10278, and must be filed within thirty (30) days of your receipt of this Complaint, Compliance Order, and Notice of Opportunity for Hearing. Your answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint, and should contain (1) a clear statement of the facts which constitute the grounds of your defense, and (2) a concise statement of the contentions which you intend to place in issue at the hearing.

The denial of any material fact, or the raising of any affirmative defense, will be construed as a request for a hearing. Failure to deny any of the factual allegations in the Complaint will be deemed to constitute an admission of the undenied allegations. Your failure to file a written answer within thirty (30) days of receipt of this instrument will be deemed to represent your admission of all facts alleged in the Complaint, and a waiver of your right to a formal hearing to contest any of the facts alleged by the Complainant. Your default will result in the final issuance of the Compliance Order, and assessment of the proposed civil penalty, without further proceedings.

INFORMAL SETTLEMENT CONFERENCE

Whether or not you request a hearing, the EPA encourages settlement of this proceeding consistent with the provisions of the Act. At an informal conference with a representative of the Complainant you may comment on the charges and provide whatever additional information you feel is relevant to the disposition of this matter, including any actions you have taken to correct the violation, and any other special circumstances you care to raise. The Complainant has the authority to modify the amount of the proposed penalty, where appropriate, to reflect any settlement agreement reached with you in such conference, or to recommend that any or all of the charges be dismissed, if the circumstances so warrant. Your request for an informal conference and other questions that you may have regarding this Complaint, Compliance Order, and Notice of Opportunity for Hearing should be directed to Jodi Lee Alper, Attorney, General Enforcement Branch, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York, 10278, telephone (212) 264-1196.

Please note that a request for an informal settlement conference does not extend the thirty (30) day period during which a written answer and request for a hearing must be submitted. The informal conference procedure may be pursued as an alternative to or simultaneously with the adjudicatory hearing procedure. However, no penalty reduction will be made simply because such a conference is held. Any settlement which may be reached as a result of such conference will be embodied in a written Consent Agreement and Final Compliance Order to be issued by the Regional Administrator of EPA, Region II, and signed by you or

your representative. Your signing of such Consent Agreement would constitute a waiver of your right to request a hearing on any matter stipulated to therein.

RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

Instead of filing an answer requesting a hearing or requesting an informal settlement conference, you may choose to comply with the terms of the Compliance Order, and to pay the proposed penalty. In that case, payment should be made by sending to the Regional Hearing Clerk, EPA, Region II, a cashier's or certified check in the amount of the penalty specified in the "Proposed Civil Penalty" section of this instrument. Your check must be made payable to the United States of America.

DATED: New York, New York

September 29, 1981

COMPLAINANT:

Michael & Muchasley =02:
Julio Morales-Sanchez

Director

Enforcement Division

U.S. Environmental Protection Agency

Region II

26 Federal Plaza

New York, New York 10278

TO: Mr. Raymond Watychowicz
Plant Superintendent
Cellofilm Corporation
241 Union Avenue
Wood-Ridge, New Jersey 07075

cc: George Tyler, Esq.
Assistant Commissioner for
Environmental Management
New Jersey Department of Environmental
Protection

bcc: Douglas Farnsworth (WH-537-M)
Gail Karlsson, (WH-537-M)
Tom Taccone, 2PM-PA
Margaret Randol, 2EP-PA

CERTIFICATE OF SERVICE

This is to certify that on the day of October, 1981 I served a true and correct copy of the foregoing Complaint by certified mail to Mr. Raymond Watychowicz, Plant Superintendent, Cellofilm Corporation, 241 Union Avenue, Wood-Ridge, New Jersey, 07075. I handcarried the original foregoing Complaint to the Regional Hearing Clerk.

ELLEN P. PALMISANO Clerk Stenographer

B. SUBSEQUENT NOTIFICATION (complete item C)

X A. FIRST NOTIFICATION

IX. DESCRIPTION OF HAZARDOUS WASTES

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF					
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EPA Form 8700-12 (6-80) REVERSE

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III. CERTIFICATION (see instructions)					
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C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that weste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste,

D. PROCESSES

- PROCESS CODES:
 - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- "included with above" and make no other entries on that line,
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

ш	1	H	A.	E	PA	D.	B. ESTIMATED ANNUAL		UNIT		D. PROCESSES									
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X-4		D	0)	0	2						-		T			11		included with above	

NOTE: Photogopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-S80004 EPA LD. NUMBER (enter from page 1) FOR OFFICIAL USE ONLY W N DUP DUP IV, DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) A. EPA HAZARD. WASTENO D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE NO. 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) 36 27 - 29 27 - 29 27 - 29 27 - 29 0 2 U 0 6000000 P S 01. D 8 0 UO 3 1 6000 000 P D80 3 P U 1 1 2 D80 6000 000 501 4 D80 U 1 4 0 6000 000 P 501 5 U 1 5 4 D80 6000000 P SOI 5 U 1 9 6 6000000 P 501 080 U 1 6 1 6000 P 01 D80 8 U 2 2 0 P 6000 000 501 9 D U 2 3 9 080 6000 000 501 10 Included with above 11 12 13 14 15 16 17 18 19 20 21 23 24 25 26 EPA Form 3510-3 (6-80)

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V. FACILITY DRAWING All existing facilities must include in the space provi	ded on page 5 a scale drawing of th	a facility (ena instructions for		
VI. PHOTOGRAPHS		A CONTRACTOR OF THE PARTY OF TH		
All existing facilities must include photograph	ns (aerial or ground—level) that	clearly delineate all existing	structures; existing storage	
treatment and disposal areas; and sites of futu VII. FACILITY GEOGRAPHIC LOCATION	ire storage, treatment or dispos	al areas (see instructions for	more detail).	
LATITUDE (degrees, minutes, & s	the state of the s	LONGITUDE (degre	es, minutes, & seconds)	
404411	6	071	0 8 1 4 2	
VIII. FACILITY OWNER	71	72 + 74	78 76 77 - 79	
A. If the facility owner is also the facility opera	itor as listed in Section VIII on For	1 110-11-11		
skip to Section IX below.	nor as nated in dection 4111 on For	m 1, General Information", pla	ce an "X" in the box to the lef	t and
B. If the facility owner is not the facility opera	tor as listed in Section VIII on For	m 1, complete the following item	ns:	
1. NAME OF	FACILITY'S LEGAL OWNER		2. PHONE NO. (area co	de & no
E				TIT
3. STREET OR P.O. BOX			55 56 - 58 59 - 61 6	2
F	c	CITY OR TOWN	5. ST. 6. ZIP COD	E
\$ 16	G 45 15 16	40	A1 42 A7 5	100
IX. OWNER CERTIFICATION	A STATE OF THE PARTY OF THE PAR			
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submitted information is true, accurate, and coincluding the possibility of fine and imprisonm		are significant penalties for s	ubmitting false information	n,
A. NAME (print or type)	B. SIGNATURE			
Robert Rossomando		,	C. DATE SIGNED	1
Vice President	Robert Rosson	rande	11/17/80	
X. OPERATOR CERTIFICATION		斯曼特别 (1) (1) (1)	THE REPORT OF THE PARTY.	
I certify under penalty of law that I have perso documents, and that based on my inquiry of the submitted information is true, accurate, and or				
submitted information is true, accurate, and co	mulata I am avera that the	nen significant and his f	normation, I believe that t	ne n.
including the possibility of fine and investigation		are significant penalties for s	ubmitting raise information	
The positionity of this and imprisoning	ent.	are significant penalties for s	ubmitting false information	
including the possibility of fine and imprisonm A. NAME (print or type)		are significant penalties for s	C. DATE SIGNED	

PA Form 8700-12 (6-80)

go to the reverse of this form and provide the requested information.

CONTINUE ON REVERS

I.D. - FOR OFFICIAL USE ORLY

reverse.
The following service is requested (check one). Show to whom and date delivered
Show to whom, date, and address of delivery.
RESTRICTED DELIVERY
Show to whom and date delivered.
RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.
(CONSULT POSTMASTER FOR FEES)
2. ARTICLE ADDRESSED TO: EPA Region 11
Information_Service Center
26 Federal Plaza
New York, N.Y. 10007
3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
3610416
(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE Addressee Authorized agent
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1 on Ticroconfiction
DATE OF DELIVERY
8/15/80
5. ADDRESS (Complete only if requested)
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6. UNABLE TO DELIVER BECAUSE: CLERK'S

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

October 3, 1980

NYD001562966

CELLOFILM CORP

137 ALEXANDER STREET YONKERS

NY 10701

Dear Sir:

The United States Environmental Protection Agency ("EPA") regulates the handling of hazardous wastes under the Resource Conservation and Recovery Act ("RCRA") 42 U.S.C. \$6901 et seq. Under Section 3010 of RCRA, 42 U.S.C. \$6930, parties handling certain quantities of hazardous wastes (these wastes are characterized and listed in regulations which were published in the Federal Register of May 19, 1980, 45 FR 33084 et seq. and July 16, 1980, 45 FR 47832 et seq.) are required to notify EPA of their activities. Facilities handling wastes defined by the May 19, 1980 regulations were required to notify by August 18, 1980. Facilities handling wastes defined by the July 16, 1980 regulations are required to notify by October 14, 1980. We have not yet received a notification from you or your company.

Section 3007 of RCRA, 42 U.S.C. \$6927, allows EPA to request certain information of parties who handle hazardous wastes. Based upon information available to this Agency, we believe that you or your company handles such hazardous wastes. Therefore, in order to determine the extent of your hazardous waste activity, and to determine whether you should have notified EPA pursuant to \$3010, we require that you complete the questionaire on the reverse side of this letter. Your completed form should be returned to us within 21 days of the date of this letter. The questionaire must be completed and signed by a responsible official of your firm. If you have already notified EPA of your hazardous waste activity, please complete the questionaire but indicate on the form your prior notification and list your EPA Identification Number, if available.

Your failure to respond to this letter in a timely manner may subject you to the initiation of enforcement action under Section 3008 of RCRA, 42 U.S.C \$6928. Such enforcement action may include the assessment of substantial penalties for continued non-compliance.

Completion of the questionaire on the reverse side of this letter does not constitute notification under RCRA. If you have any questions on the contents of this letter or desire a notification package, please write the EPA Information Service Center (ISC) of 26 Federal Plaza, New York, New York 10278.

Sincerely yours,

Julio Morales-Sanchez

pirecto

Enforcement Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II 26 FEDERAL PLAZA NEW YORK NEW YORK 10278

FEB 2 2 1981

Dear Sir:

The United States Environmental Protection Agency (EPA) regulates the handling of hazardous wastes under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6901 et seq. Under Section 3010 of RCRA, 42 U.S.C. §6930, parties handling certain quantities of hazardous wastes are required to notify EPA of their activities. These wastes are characterized and listed in regulations which were published in the Federal Register of May 19, 1980, 45 FR 33084 et seq. and July 16, 1980, 45 FR 47832 et seq. Facilities handling wastes defined by the May 19, 1980 regulations were required to notify EPA by no later than August 18, 1980. Facilities handling wastes defined by the July 1980 regulations were required to notify EPA by no later than October 14, 1980. We have received notification from your company identifying you as a generator of hazardous wastes.

Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information from parties who handle hazardous wastes. In order to determine the extent of your hazardous waste activity and more fully develop our regulatory program, we hereby require that you answer the questions posed below. Your reply should be completed and signed by a responsible official of your company, and must be returned to us within 15 calendar days of the date of this letter.

Please answer the following questions:

l. List all hazardous wastes which have been generated at the facility named in the address of this letter, above, between November 19, 1980 and the present. For each such waste, provide the chemical name (or generally accepted common name), and state the quantities of such wastes and the date(s) on which the wastes were generated. Information on the quantities and dates may be provided as a daily or weekly total; specify the reporting period which you use in answering this question.

- How have these wastes been disposed of? Specifically, if any wastes have been removed from the premises of the above-named facility, list the dates of such removal, the quantities and types of wastes removed, the transporter or carrier which performed the removal, and the address and EPA Identification Number of such transporter or carrier. Also list the treatment, storage or disposal facility to which such wastes were removed, including the address and EPA Identification Number of each such facility, the types and quantities of wastes brought to each facility, and the dates on which those wastes were brought to each.
- 3. For any wastes generated during the specified period, but not removed from the premises of the above-named facility, state whether it is your intention to store such wastes on the premises for longer than 90 days from the date they were generated. If the answer is yes, list the types and quantities of wastes to be so stored, and state whether you have received an EPA identification number as a hazardous waste storage facility.

Your response to this letter should be addressed to:

Bruce Adler
Attorney
General Enforcement Branch
Enforcement Division
U.S. Environmental Protection Agency, Region II
26 Federal Plaza, Room 437
New York, New York 10278

Your failure to respond to this letter within the time provided may subject you to the initiation of an enforcement action under Section 3008 of RCRA, 42 U.S.C. §6928. Such enforcement action may include the assessment of substantial penalties of up to \$25,000.00 for continued non-compliance.

If you have any questions concerning this letter, you may call Mr. Adler at (212) 264-9898.

Singerely yours,

Muchael Muchandy Fox:

Director

Enforcement Division

STRAUBING & RUBIN

CONSULTING ENGINEERS

6 SOUTH DRANGE AVENUE SOUTH DRANGE, N. J. 07079

(201) 762-5950 TELEX NO. 138196

/July 7, 1982

Dr. Richard Baker
Permits Administration

Permits Administration Branch

Room 432

U.S. Environmental Protection Abency

26 Federal Plaza

New York, New York 10007

Re: 1. Cellofilm Corporation, Newark, New Jersey EPA Id. Nbr. NJD000813451

 Cellofilm Corporation, Wood-Ridge, New Jersey EPA Id. Nbr. NJD001394303

Our Project No. C-1688

Dear Dr. Baker:

Attached are refilings of EPA Form 8700-12 (6-80) and EPA Form 3510-1 (6-80) for our client, Cellofilm Corporation. These forms apply to their facilities located at 45-5 Cornelia Street, Newark, New Jersey, and 241 Union Avenue, Wood-Ridge, New Jersey. In essence, these two facilities are refiling as only generators of hazardous waste. After further review of Cellofilm's operations, it was determined that neither facility is a T/S/D facility, nor do they transport hazardous waste as was stated on the original applications.

If there are any questions regarding the above, please contact the undersigned.

Very truly yours,

STRAUBING & RUBIN

Kenneth C. Friis

KCF:bmc
Attachments:

cc: Mr. S. Eysmann

Mr. P. Sullivan

Mr. R. Rossomando

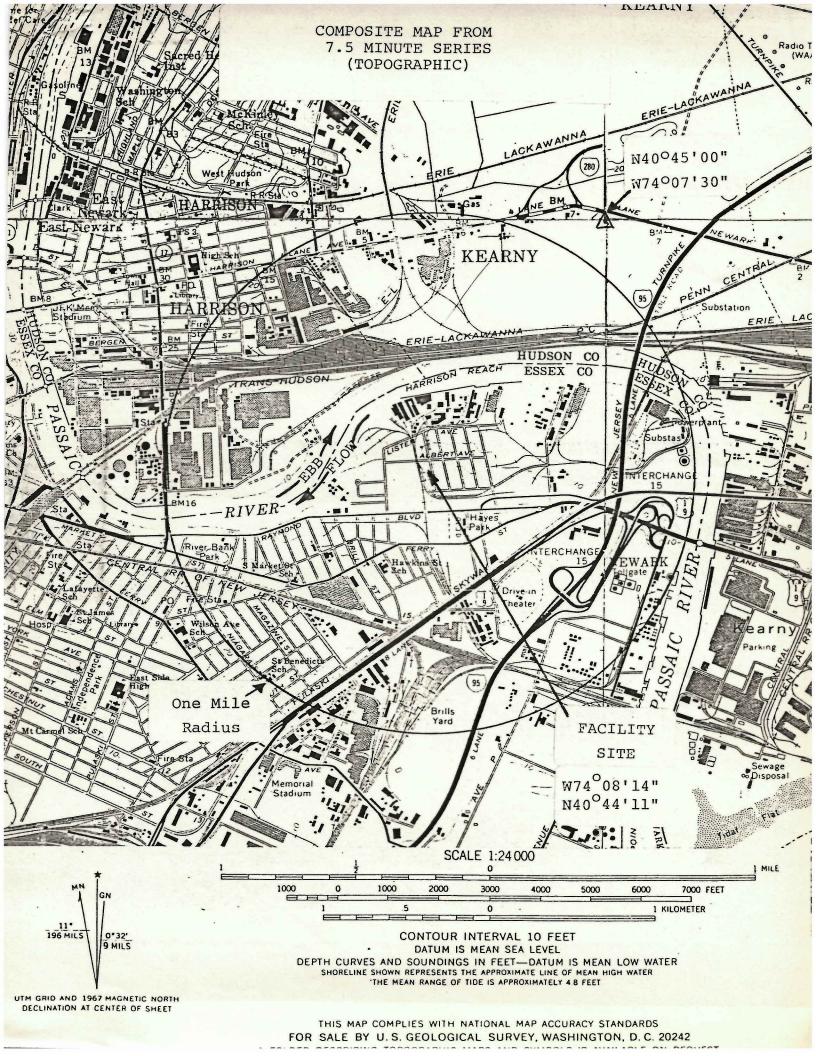
					W	7/A C
IX. DE	SCRIPTION OF HA	ZARDOUS WAST	ES (continued from	front)	1 2	- 13 14 18
A. HAZ	ARDOUS WASTES FR	ROM NON-SPECIFIC		four-digit number from	m 40 CFR Part 261.31 f	or each listed hazardous
		2	3	4	5	6
	F003					
The res	23 - 26	F 0 0 5	23 - 26	23 - 26	23 - 26	23 - 26
200	7	8	9	10	11	12
nee out to						
B. HAZA	ARDOUS WASTES FR	OM SPECIFIC SOUR	CES. Enter the four-d	igit number from 40 C	FR Part 261.32 for each	listed hazardous waste from
specif	ic industrial sources yo	our installation handle	s. Use additional sheets	if necessary.		
	13	14	15	16	17	18
	23 • 26	23 - 26			7 7 7 11 1 1 1 1 1 1 1 1	
	19	20	23 - 26	23 - 26	23 - 26	24
	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
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C. COMP	MERCIAL CHEMICAL your installation hand	PRODUCT HAZARI	DOUS WASTES. Enter azardous waste. Use add	the four—digit number ditional sheets if necess	from 40 CFR Part 261. ary.	33 for each chemical sub-
14	31	32	33	34	35	36
	U 0 3 1	U 2 3 9	U 2 2 0			
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Hella .	43	44	45	46	47	48
			7			
D. LISTE	ED INFECTIOUS WAS	TES. Enter the four-	-digit number from 40 (23 - 26 CER Part 261 34 for ea	ch listed hazardous was	te from hospitals, veterinary
hospit	als, medical and resear	ch laboratories your i	nstallation handles. Use	additional sheets if ne	cessary.	is from nospitals, veterniary
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199						
E. CHAR	ACTERISTICS OF No	ON-LISTED HAZAR lation handles. (See 4	DOUS WASTES. Mark	"X" in the boxes corre	esponding to the charact	eristics of non—listed
	1. IGNITABLE		2. CORROSIVE	3. REAC	CTIVE	☐4. TOXIC
X CER	TIFICATION			(10003)		(D000)
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SIGNATU	JRE		NAME & OFF	CIAL TITLE (type or	print)	DATE SIGNED
	Petal Posson		Robert Ro			111
	HAM Losson	nande	Vice Pres	ident		6/28/82

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EPA Form 8700-12 (6-80) REVERSE

(fill-in areas are spaced for elite type, i.e., 12 characters fincl		Form Approved UMB No. 158-HU1/5					
runini di dia dia dia dia dia dia dia dia dia	ECTION AGENCY I. EPA I.D. NUMBER						
WEFA a	Program FN J D O O O 8 1	3.4.5.1					
			" before starting.)	UCTIONS			
I. EPA I.D. NUMBER			If a preprinted label has be it in the designated space.	Review the inform-			
HIL FACILITY NAME			stion carefully; if any of it through it and enter the appropriate fill—in area bel	correct data in the ow. Also, if any of			
V. MAILING ADDRESS PLEASE PL	ACE LA	BEL IN	the preprinted data is abseleft of the label space list that should appear), please proper fill—in area(s) belo complete and correct, you	ts the information provide it in the w, if the label is			
VI. FACILITY			items I, III, V, and VI (a must be completed regard items if no label has been the instructions for deta	except VI-B which less). Complete all provided. Refer to			
LOCATION		11	tions and for the legal at which this data is collected.				
II. POLLUTANT CHARACTERISTICS			是多的是第三人称单位,但是是是不是				
questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no"	tal form I	isted in the question, y	submit any permit application forms to the EPA. If you ans e parenthesis following the question. Mark "X" in the box in you need not submit any of these forms. You may answer "no o, Section D of the instructions for definitions of bold—faced	the third column " if your activity			
SPECIFIC QUESTIONS	ALC: UNKNOWN TO THE REAL PROPERTY OF THE PERTY OF THE PER	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X'			
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.?		ATTACHED	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or	All Action			
(FORM 2A) C. Is this a facility which currently results in discharges	76 17	10 10	aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B) D. Is this a proposed facility (other than those described	X 19 20 21			
to waters of the U.S. other than those described in A or B above? (FORM 2C)	X 22 23	24	in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	X 25 26 27			
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X 26 20	30	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	X 31 32 33			
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas pro- duction, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	X .			
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an	X	15 156 10 100 100 10 100 100 100	J, is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment	X X			
attainment area? (FORM 5)	40 41	42	area? (FORM 5)	43 44 45			
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IV. FACILITY CONTACT							
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2 ROSSOMANDO ROBERT		.V.I.C	E PRES 2.0.1 4.3.8 7.1.0.0				
V. FACILITY MAILING ADDRESS		Here were					
a. STREET OR P.O.	BOX		· · · · · · · · · · · · · · · · · · ·	18			
8. CITY OR TOWN		4. X. %	C.STATE D. ZIP CODE	4			
4 W.O.O.D R.I.D.G.E	1 1 1	T T T		1 1/1/12			
11 18			N.J. 0.7.9	1/1/0			
VI. FACILITY LOCATION							
A. STREET, ROUTE NO. OR OTHER S	E.E.T	DENTIFI	The second state of the se	NATIONAL PROPERTY.			
B. COUNTY NAME				Construction of			
E.S.S.E.X		net de la	D STATE E ZIP CODE F. COUNTY CODE				
C. CITY OR TOWN N.E.W.A.R.K.	1 1 1		D.STATE E. ZIP CODE F. COUNTY CODE (If known)	771			
EPA Form 3510-1 (6-80)			40 41 42 47 - 91 92 - 34	NUE ON REVERSE			

VII. SIC CODES (4-digit, in order of priority)	> designated different profession		A CONTRACTOR	3,300
A. FIRST		c (specify)	B. SECOND	go again
7 2 .8 .6 .9 INDUSTRIAL ORGAN	IC CHEMICALS	7		
18 146 - 19 C. THIRD		15 16 - 19	D. FOURTH	Secretary
7 2 8 5 1 PAINTS AND VARNI	SHES	5 (specify)		Y
VIII. OPERATOR INFORMATION		15 16 - 19		
	A, NAME			name listed I
BCELLOFILM CORP	ORATION		owner	
11 11 Francisco Company	STATE OF THE SECOND	and hour of HOshari' and the I	一种心理和证据。00年7月 2 月末超過	(ASSESSED)
F = FEDERAL M = PUBLIC (other S = STATE O = OTHER (specify P = PRIVATE	than federal or state)	(specify)	D. PHONE (area code & A 2 0 1 5 8 9 3	8 7 1
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4. 5, 5 C. O. R. N. E. L. I. A.	STREET			
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BNEWARK		N,J 0,7,1,0	Is the facility located on Indian I	lands?
15 16 TOPE STORE BUILDING STREET	the walk regulation was taken as he	40 41 42 47 -	52	
X. EXISTING ENVIRONMENTAL PERMITS			· ·	
A. NPDES (Discharges to Surface Water)	D. PSD (Air Emission	ons from Proposed Sources)		解发织。
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B. UIC (Underground Injection of Fluids)	E. OTH	HER (specify)	ecify)	新野中 点。
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C. RCRA (Hazardous Wastes)		HER (specify)	CHARLES TO THE COMMENT OF THE COMMEN	A CHARLE
9 R	9	(sp	ecify)	
15 fa 17 18 XI. MAP	30 15 46 17 18	- 30		
Attach to this application a topographic the outline of the facility, the location treatment, storage, or disposal facilities water bodies in the map area. See instruction of the storage	of each of its existing and , and each well where it in ctions for precise requireme	proposed intake and discharg jects fluids underground, Incl	e structures each of its hazardou	atseur 21
m				
This facility transports resins and coatings. So compartments are washed contamination between the removed from the site was for proper disposal.	mall quantities of with Xylene, Tolue he various products	hazardous waste are g ne, and/or N-Butyl Al being transported.	generated when tank tru Lcohol to avoid cross- Hazardous wastes are	ıck
				,
III. CERTIFICATION (see instructions)				
i certify under penalty of law that I had attachments and that, based on my in application, I believe that the informati false information, including the possibili	quiry of those persons im on is true, accurate and co	mediately responsible for obtaining that then	sining the information contains	d in the
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNA	TURE	C. DATE SIGNE	ED
Robert Rossomando Vice-President		2112 1	11 1	ν,
COMMENTS FOR OFFICIAL USE ONLY	, A	Auf lossomanch	6/28/82	
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State of New Jersen

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 027, Trenton, N.J. 08625

Dr. Marwan M. Sadat

LINO F. PEREIRA
DEPUTY DIRECTOR

October 24, 1983

Mr. Robert Rossomando, Vice President Cellofilm Corporation 241 Union Avenue Wood-Ridge, New Jersey 07075

RE: Operating Status of Cellofilm Corporation, Newark Plant EPA ID NO. NJD000813451

Dear Mr. Rossomando:

The Bureau of Hazardous Waste Engineering (the Bureau) is in receipt of a letter from Straubing & Rubin dated September 13, 1983 clarifying that the storage tank as delineated in your company's Part A application is an error and no such tank exists at this facility. The Bureau also received a letter from Straubing & Rubin dated July 7, 1983 requesting that the referenced facility be reclassified from a hazardous waste treatment, storage or disposal (TSD) facility to "generator only" status. According to your company's consultant's correspondence, it is the Bureau's understanding that the referenced facility accumulates on-site generated wastes in containers only for periods of 90 days or less.

Therefore, on the basis of this information, the Bureau classifies your facility solely as a generator provided all such waste is accumulated on-site and the following requirements of N.J.A.C. 7:26-9.3 and 40 CFR 262.34 are complied with:

- 1) All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
- 2) The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
- 3) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
- 4) The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

Robert Rossomando

This written acknowledgement of the delisting of the above identified facility from TSD facility status to generator status, is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occurring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities". It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,

Frank Coolick, Chief

Bureau of Hazardous Waste Engineering

EP11/jb

c: Joel Golumbek USEPA, Region II

> Dave Leu, Ph. D. NJDEP, DWM, BHWCM





State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 027, Trenton, N.J. 08625

Dr. Marwan M. Sadat

LINO F. PEREIRA
DEPUTY DIRECTOR

October 24, 1983

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Dear Mr. Rossomando:

The Bureau of Hazardous Waste Engineering (the Bureau) is in receipt of a letter from Straubing & Rubin dated September 13, 1983 clarifying that the storage tank as delineated in your company's Part A application is an error and no such tank exists at this facility. The Bureau also received a letter from Straubing & Rubin dated July 7, 1983 requesting that the referenced facility be reclassified from a hazardous waste treatment, storage or disposal (TSD) facility to "generator only" status. According to your company's consultant's correspondence, it is the Bureau's understanding that the referenced facility accumulates on-site generated wastes in containers only for periods of 90 days or less.

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- 1) All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
- The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
- The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
- 4) The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

STRAUBING & RUBIN CONSULTING ENGINEERS

6 SOUTH DRANGE AVENUE SOUTH ORANGE, N. J. 07079

(201) 762-5950 TELEX NO. 138196

September 13, 1983

Mr. Frank Coolick, Chief Bureau of Hazardous Waste Engineering State of New Jersey Department of Environmental Protection 32 E. Hanover St. CN-027 Trenton, N.J. 08625

Cellofilm Corporation Truck Loading Facility RCRA Facility Classification S & R 1797

Dear Mr. Coolick:

We received a call this date (September 13, 1983) concerning Cellofilm's classification.

The call related to an apparent discrepancy between the original RCRA filing November 1980 and the revised subsequent filing dealing with Cellofilm's classification insofar as it relates to RCRA.

The call stated that in the original filing on November 1980, when Cellofilm filed as a TSD facility, a 12,000 gallon on site storage tank was utilized for storage of "Waste". The revised application in which Cellofilm filed as a "generator" only, makes no mention of this tank. In accordance with your request of this date, we wish to state that there never was, nor is there presently, a 12,000 gallon storage tank for "waste".

Since we did not file the original application, we have no knowledge of why such a tank was incorporated in the 1980 filing. We would appreciate a copy of that application for our records. We trust that the foregoing supplies the information that you requested and hopefully this will adjust the apparent discrepancy.

Very truly yours,

Autan & Streater Arthur L. Straubing, P.E.

STRAUBING & RUBIN

On behalf of Cellofilm Corporation

ALS:ms

cc: Mr. R. Russamondo, V. Pres.

ali

STRAUBING & RUBIN

6 BOUTH DRANGE AVENUE BOUTH DRANGE, N. J. 07079

(201) 762-5950 TELEX NO. 138196

July 7, 1982

Dr. Richard Baker
Permits Administration Branch
Room 432
U.S. Environmental Protection Abency
26 Federal Plaza
New York, New York 10007

- Re: 1. Cellofilm Corporation, Newark, New Jersey EPA Id. Nbr. NJD000813451
 - Cellofilm Corporation, Wood-Ridge, New Jersey EPA Id. Nbr. NJD001394303

Our Project No. C-1688

Dear Dr. Baker:

Attached are refilings of EPA Form 8700-12 (6-80) and EPA Form 3510-1 (6-80) for our client, Cellofilm Corporation. These forms apply to their facilities located at 45-5 Cornelia Street, Newark, New Jersey, and 241 Union Avenue, Wood-Ridge, New Jersey. In essence, these two facilities are refiling as only generators of hazardous waste. After further review of Cellofilm's operations, it was determined that neither facility is a T/S/D facility, nor do they transport hazardous waste as was stated on the original applications.

If there are any questions regarding the above, please contact the undersigned.

Very truly yours,

STRAUBING & RUBIN

Kenneth C. Friis

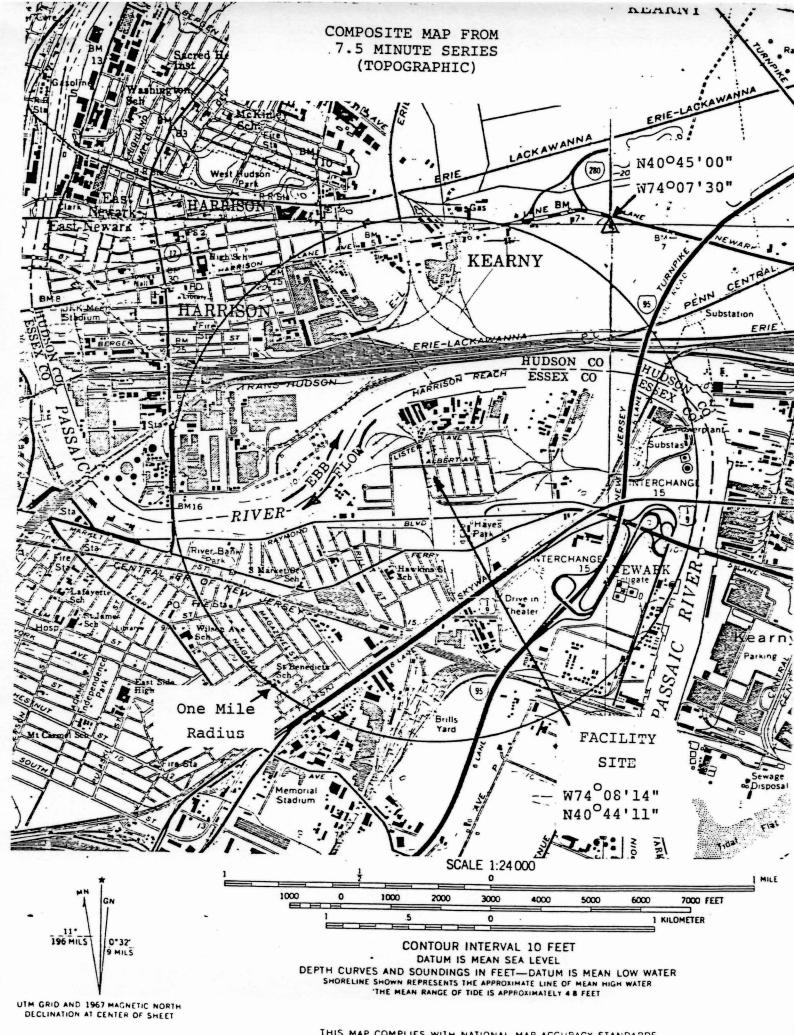
KCF:bmc Attachments:

cc: Mr. S. Eysmann

Mr. P. Sullivan

Mr. R. Rossomando

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